

Morgan Lewis

Sandra L. Moser

Partner
+1.202.739.5393
sandra.moser@morganlewis.com

June 13, 2025

VIA EMAIL

The Honorable Robert Kirsch
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *United States v. Silber*, 3:24-cr-00446 and *United States v. Schulman*, 3:24-cr-000497

Dear Judge Kirsch:

The government and defendants ("Parties") in the above cases jointly write the Court regarding the upcoming 90-day deadline to set restitution, which expires on Monday, June 16. The Receiver for the Williamsburg of Cincinnati Apartments has selected a winning bidder for the sale of the property and the sale price will soon be announced. The Parties have been actively working on reaching a restitution obligation that takes the sale price into account, ensures the victim receives appropriate restitution related to these matters, and minimizes the issues (if any) requiring the Court's time and attention. To that end, the Parties jointly request the Court enter a 30-day extension to afford them additional time to finalize the restitution amount. *See Dolan v. United States*, 560 U.S. 605 (2010) (sentencing court can order restitution beyond initial 90-day statutory deadline).

Respectfully,

By: /s/ Martha K. Nye
Martha K. Nye
Assistant United States Attorney
United States Attorney's Office for the District
of New Jersey

By: /s/ Eric Kanefsky
Eric Kanefsky
Calcagni Kanefsky, LLP
Counsel to Mark "Moshe" Silber

By: /s/ Babasijibomi Moore
Babasijibomi "Siji" Moore
Trial Attorney
United States Department of Justice

By: /s/ Justin D. Weitz
Sandra L. Moser
Justin D. Weitz
Morgan, Lewis & Bockius LLP
Counsel to Fredrick Schulman

SO ORDERED


Robert Kirsch, U.S.D.J.

Date: June 16, 2025

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

📞 +1.202.739.3000
📠 +1.202.739.3001